



Mr. Andrew Crabtree, Envision Team Leader
Planning, Building and Code Enforcement
San Jose City Hall
200 East Santa Clara Street
San Jose, CA 95113

March 2, 2011

Dear Mr. Crabtree,

Please accept this second letter from Greenbelt Alliance on the draft San Jose General Plan. Greenbelt Alliance has had the opportunity to follow the Envision San Jose 2040 General Plan update process from the beginning as a member of the Task Force. Our previous letter focused on health policy language within the draft Plan and included an attachment from Public Health Law and Policy.

Greenbelt Alliance offers the following comments for your consideration:

Coyote Valley Wildlife Corridor

Greenbelt Alliance commends the City of San Jose for including language about Coyote Valley's role as a landscape linkage between the Santa Cruz Mountains and the Mount Diablo Range. Students from the Coyote Valley Landscape Institute at De Anza College have been documenting wildlife movement through the corridor for several years. They have documented over 200 bird species and at least 17 mammal species including coyote, bobcat, mountain lion and badger. ([Attachment 1, De Anza brochure](#))

Greenbelt Alliance requests that the following changes, as suggested by students from De Anza College, be made to **Goal ER-8- Wildlife Movement**:

- In the second paragraph of the introduction of Wildlife Movement, the last sentence should read: *Within the City's Sphere of Influence, Coyote Valley **and Almaden Valley***

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still provide a landscape linkage between these two ranges. Almaden Valley is also critical to providing connectivity between the two mountain ranges.

- Included within the second paragraph of the introduction of Wildlife Movement, we recommend there be language which *encourages the acquisition and protection of key parcels maintaining connectivity.*
- In Action ER-8.4, South Coyote Valley should be changed to ***Mid Coyote Valley***. Mid Coyote Valley is extremely critical to allowing wildlife movement between the two mountain ranges.
- In Action ER-8.4, the language "at least portions" is too vague and should be strengthened.
- Add ER-8.5 which states: ***Identify and protect critical linkages in the Coyote Valley floor, especially in Mid Coyote Valley, as the Coyote Valley Critical Linkages for Wildlife.***

The Bay Area is a rare ecological gem: it is one of the six most important biodiversity hotspots in the nation, according to The Nature Conservancy. Preserving and restoring this extraordinary environment is both an ecological imperative and in our self-interest. Wildlife corridors allow animals to migrate to adjust to climate changes. Many species cannot be sustained solely by remaining inside the boundaries of existing protected areas. The ability to find new mates in new places protects genetic health and diversity. And a region with open spaces rich with native plants and animals attracts tourists and a talented workforce that values nearby nature.

Back-loading Coyote Valley

North Coyote Valley is designated as an Industrial Park on the land use map and would be available to accept job growth within the horizon of Envision 2040. Greenbelt Alliance supports San Jose in its desire to attract more jobs and understands the need to have a variety of job lands in order to be flexible and responsive to the market.

At the same time, San Jose's urban footprint is very large and offers many opportunities to accommodate job growth before developing open space lands. These urban infill areas must be exhausted first. Therefore, Greenbelt Alliance champions the suggestion made by Brian Schmidt of Committee for Green Foothills regarding back-loading development in North Coyote Valley. The back-loading concept would mean that new permits for uses unrelated to current open space uses would not be allowed until jobs capacity had been fully developed elsewhere in the City. An

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exception to this concept would be if a *substantial and unique* opportunity presents itself for economic development that cannot occur elsewhere in the City. This exception should rely upon indicators of the City's economic and environmental health that suggest when Coyote Valley development would be appropriate.

Five Wounds Brookwood Terrace Village Plan

A cornerstone of Envision 2040 is the concept of Urban Villages, Corridors and Regional Transit Hubs. Planning for urban villages will require significant input from the surrounding neighborhoods, and one neighborhood, in partnership with San Jose State and the City of San Jose, has already spent countless hours on their BART village plan. Five Wounds Brookwood Terrace has been planning for the future of their community and this effort should be a model for other neighborhoods throughout the City.

Envision 2040 must reference the Five Wounds Brookwood Terrace Village Plan and incorporate many of its elements. In particular, the Rail-to-Trail component of the Village Plan must be included in Envision 2040. The Five Wounds Brookwood Terrace neighborhood has recognized the importance of the details that contribute to a high quality of life, such as public art, great public spaces, parks and trails. The railroad right of way is not protected from development and is currently designated as a floating park. Envision 2040 must guarantee that the entire length of right of way is protected.

One of San Jose's Green Vision Goals is to "create 100 miles of trails connecting with 400 miles of on-street bikeways." However, since VTA retains the right to sell portions of the rail right of way to developers, key linkages in the trail system can be lost to development. This has happened in between East William Street and Highway 280. ([Attachment 2, Google Earth link](#)) San Jose and VTA must work together to protect these trail connections.

The *Five Wounds/Brookwood Terrace BART Station Community Concept Plan* goes to great lengths to outline "conceptual plans and urban design guidelines for the conversion of the inactive railroad right-of way (ROW) in the Planning Area to a bicycle and pedestrian trail and several small park-like special use areas." The urban design guidelines are exceptional, going into detail about lighting, safety, way-finding, streetscape and building frontages and setbacks. Greenbelt Alliance encourages the City to include this vision of a successful Rail-to-Trail transition in Envision 2040.

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Comments on Chapter 3: Environmental Leadership

Greenbelt Alliance has the following comments and suggested changes:

Goal MS-3- Included within this section must be language about Low-Impact Development which is an approach to stormwater management that mimics natural hydrological processes to use stormwater beneficially.

Goal ER-4- Bay and Baylands- There is some excellent language included here such as *The baylands ecosystem shall be protected, preserved and restored in a manner consistent with the fragile environmental characteristics of this area...* It makes sense then that as part of the Water Pollution Control Plant Master Plan process, an “Environment, Ecology and Water Alternative” be studied. A letter submitted by several environmental organizations, including Greenbelt Alliance, is included as an attachment. ([Attachment 3, Environmental letter on WPCP](#))

Policy EC-5.10- *Encourage the preservation **and restoration** of urban creeks and rivers to maintain existing floodplain storage.*

Policy IN-3.8- Improvements should be restoration of natural habitat instead of concrete channelization.

Comments on Chapter 5: Land Use and Transportation

Greenbelt Alliance has the following comments and suggested changes:

Policy LU-8.2- Support Large-Format Commercial: While this issue has most likely been addressed, Combined Industrial/Commercial lands were designated in the Diridon Station Area. Large-scale regional uses with significant parking must not be allowed under any circumstances in the vicinity of Diridon Station. It should be recognized that this land use designation is inappropriate near any transit station.

Policy LU-15.3- Greenbelt Alliance recommends the following addition, *Protect and preserve the remaining farmlands within San Jose’s sphere of influence that are not planned for urbanization in the timeframe of this general plan, **such as mid- and south Coyote Valley**, through the following means...*

Policy LU-17.1- *Prohibit* subdivision if agricultural lands....

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Policy TR-1.4- *Transportation improvements funded through new development should include needed improvements to all modes, **with priority given to bicycling, walking and transit.***

Action TR-1.13- Will the list of streets for rightsizing that San Jose's Department of Transportation shared with the Task Force be included in the General Plan?

Action TR-2.16- It will be helpful to reference the Five Wounds Brookwood Terrace BART Plan here.

Policy TR-5.3- The Protected Intersections language can be made stronger in order to reach the goal of reducing vehicle miles traveled by 40% by 2040. San Jose should make the Protected Intersections approach the rule, and traditional Level of Service the exception. Specifically:

- Every intersection in Planned and Identified Growth Areas should be allowed to exceed automobile Level of Service D, and
- Every project in Planned and Identified Growth Areas should construct improvements to the city's non-auto transportation system, rather than expand road capacity at a given intersection, regardless of the current LOS at that intersection (e.g. even intersections that currently operate at LOS A, B, or C should not be expanded if a new project will cause their LOS to deteriorate).

San Jose is already taking the lead by re-designating streets as 'Grand Boulevards', 'Bicycle Priority Streets' and 'Main Streets'. Those intersections that involve streets that give top priority to the auto as a travel mode can then be considered on a case-by-case basis for potential exemption from the Protected Intersection Policy and a return to the traditional Level of Service approach.

Greenbelt Alliance commends San Jose for including language stating that proposed developments causing a significant LOS impact at a protected intersection must include construction of specific improvements *to enhance non-auto travel modes*. The Community Improvement Zones for where improvements can be made should be expanded appropriately to incorporate the areas surrounding the Planned and Identified Growth Areas. The goal here is to avoid expanding roads one neighborhood over as a result of a development's impact on a protected intersection.

The City should work with the Strong Neighborhoods Initiatives groups to help communities identify neighborhood needs for improvements to the bicycle, pedestrian, and transit networks.

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Action TR-5.7- Include language that prioritizes lower-income and high density neighborhoods for traffic management measures.

Policy TR-8.10- Create Parking Benefit Districts throughout the City, especially in urban villages and near transit stations. Charge performance based prices for curb parking and return the revenue to the neighborhood to pay for improvements, such as graffiti removal and landscaping.

Policy TR-8.4- Prohibit, as part of the entitlement process, the provision of parking spaces significantly above the number of spaces required by code for a given use.

Action TR-11.4- Support a regional parking policy that levels the playing field and incentivizes local reforms. Do this in coordination with other regional climate/ smart growth strategies such as the Sustainable Communities Strategy.

Action TN-1.6- Add a timeframe for when Trail Design Guidelines will be completed.

Policy TN-2.7- Require all developers to install and maintain trails when new development occurs adjacent to a designated trail location...

In the Land Use Designations section, under Urban Reserve, language must be modified as follows, *Due to the environmental and fiscal impacts associated with development in the Urban Reserve areas, **urban and suburban development is prohibited here through the year 2040.***

Comments from Ambassador meetings

Greenbelt Alliance has had the opportunity to go out into the community to talk about Envision 2040. Included here are some of the comments we heard and we encourage the Envision 2040 Team to incorporate goals and policies that address these concerns.

Envision 2040 must address gentrification. There is concern that growth and new development will displace those who rent their homes or businesses. A critical question that must be addressed is “How can we ensure that growth benefits all who live and work in San Jose?” Small businesses contribute to neighborhood quality of life and more must be done to address fears of displacement when a village plan is proposed. The City should protect existing small businesses and help them transition as new development alters a community. Consider the following by Christine Bork in The Huffington Post:

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Since the mid-1990s, small businesses have created 60 to 80 percent of the new jobs in our country. Supporting small business growth is critical during economic downturns like the one we're currently experiencing today. The smallest companies often create the most jobs during a recession. And one of the fastest growing segments of small business owners in our country is women, making the success of women-owned businesses key to getting people back to work and growing our economy.

Certain neighborhoods are extremely hostile to pedestrians. For example, in the Seven Trees neighborhood, cars are speeding 50 miles per hour along the expressway and there is no crosswalk for miles. In other neighborhoods, such as around Saint Maria Goretti, streets have been widened to make more room for cars while pedestrian crosswalks have been removed. However, this does not prevent people from crossing the street and only increases the chances of pedestrian accidents. Among those who are dependent on walking or riding transit are the elderly or recent immigrants and they are often victims of vehicular accidents in East San Jose. According to the Metropolitan Transportation Commission, older adults make up 20% of all pedestrian fatalities. Streets with high rates of pedestrian and cyclist accidents should be prioritized for traffic calming measures and complete streets implementation.

Planning versus implementation. Plans are only good if they are implemented according to the community's vision. There was significant concern that the great policy language included with Envision 2040 will not be acted upon based on prior experiences with the City not following through on a vision or plan.

In conclusion, Greenbelt Alliance appreciates the opportunity to participate in the update of Envision 2040. We will continue to conduct outreach into the community to build awareness and collect feedback on the Draft Plan. It is our goal that the Final Envision San Jose 2040 General Plan be a model of environmental sustainability, social equity and economic stability to cities throughout California. Greenbelt Alliance believes this Draft Plan is making great strides in this direction.

Sincerely,



Michele Beasley
Senior Field Representative, South Bay

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